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**From:** Maribeth Greenslade [greenslade.maribeth@azdeq.gov]  
**Sent:** 11/25/2019 6:30:38 PM  
**To:** Rumrill, Nancy [Rumrill.Nancy@epa.gov]  
**Subject:** Florence Copper  
**Attachments:** Figure 12-1.pdf

Hi Nancy,

Does the aquifer exemption at Florence Copper apply to the Area of Review (AOR) for the ISCR area as shown on the attached Figure 12-1 from the APP application?

Florence Copper APP application indicates:

"Figure 12-1 shows the proposed PMA for the planned ISCR well field and related discharging facilities at the FCP site. As shown on Figure 12-1, the portion of the proposed PMA surrounding the planned ISCR wellfield lies within the aquifer exemption boundary established by EPA's UIC Permit No. AZ396000001 (now superseded) and incorporated into the current UIC permit for the FCP site (No. R9UIC-AZ3-FY11-1)."

and

"The portion of proposed PMA that is located at the planned ISCR wellfield also lies within the Area of Review (AOR) and aquifer exemption area previously established by the UIC Permit No. AZ396000001 (now superseded) issued by the USEPA, is retained in the current UIC. 40 CFR § 146.6(a)(ii) describes the AOR as the "...lateral distance from the perimeter of the project area, in which the pressures of the injection zone may cause the migration of the injection and/or formation fluid into an underground source of drinking water." The AOR is the area within which the USEPA will regulate the installation and construction of all wells for the purpose of protecting underground sources of drinking water from fluid migration resulting from injection."

Thanks,  
Maribeth

**Maribeth Greenslade, P.E.**

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